

Karen Ashikeh LaMantia  
341 Bonito  
Long Beach, CA 90802  
Feb. 7, 2005

Ms. Angela Reynolds , Environment Officer  
Department of Planning and Building: Sports Park DEIR  
City Of Long Beach  
333 West Ocean Blvd.  
Long Beach, CA 90802

Concern : DANGER FROM SOIL CONTAMINATION

Section 4.13.1 - Soil studies of the site Identified residual, detected concentrates of the metals beryllium, cadmium, at 1 foot depth and nickel, arsenic, beryllium and cadmium ant 10 feet depth. These metals were determined to exceed accepted regulatory criteria used to define risk to human health. Asbestos, lead based paint and PCBs were detected. These soil samples were taken without the site being graded or disturbed. It is unknown what is under the surface throughout the site. The possibility that toxic substances were dumped at this site and buried, cannot be discounted.

1

Questions: What assurance is there that grading of this site will not release more toxic chemicals and gases into the environment, with the extensive grading planned for this project?

Would minimum requirements for worker safety be assured during the grading process?  
If the City of Long Beach liable for toxic exposure to workers during this discovery period?

2

This study states that soil contamination is considered unlikely based on extensive soil samples but outlines health and Safety Risks to workers, monitoring programs and outlines a Health and Safety Plan to address these issues in section 4.13.2.

3

Thank you for your consideration of my concerns.

Karen Ashikeh LaMantia  
2/7/05

## KAREN ASHIKEH LAMANTIA/SIXTH LETTER

### **P-9-1**

It is not clear to which section the author is referring. Section 4.13.1 of the Draft EIR is the Introduction. Mitigation Measure 4.13.1 is predemolition surveys.

Section 4.13 of the Draft EIR states that a Soil Management Plan will be prepared and approved by the LARWQCB prior to the commencement of demolition and grading activities on site. The purpose of the Soil Management Plan is to provide direction in the event that discolored or odiferous soil is discovered.

The term “toxic substances” is a misapplication of the term “toxic.” A material is identified as toxic after sampling and analysis. It is possible that discolored or odiferous soils may be uncovered or discovered during the demolition and grading activities to be conducted on site. The LARWQCB-approved Soil Management Plan will address the specific steps to follow in the event that such soils are discovered.

Additionally, Section 4.13 addresses a similar misuse of the term at the public scoping meeting on page 4.13-32. Moreover, the historic use of the project site was as an oilfield. The numerous investigations that have been conducted on site resulted in the collection and analysis of over 867 soil samples and over 112 soil vapor samples. The chemicals detected in site soils and soil vapor are indicative of oil field uses. Total petroleum hydrocarbon constituents associated with oilfield activities are typically heavy-end hydrocarbons or crude oil. The health risk associated with crude oil is much smaller than the risk at sites impacted by refined oil products.

Furthermore, crude oil is considered a designated waste, not a hazardous waste under current California regulations.

Lastly, the Draft HRA prepared in August 2003 using the data collected during 2002 and 2003 under the auspices of the EPA-approved Soil Sampling and Analysis Plan does not indicate that a risk or adverse impact to human health exists due to exposure to constituents of concern detected at 1 foot bgs, 5 feet bgs, and greater than 10 feet bgs. These constituents of concern include but are not limited to the metals cited in this comment.

### **P-9-2**

Please see Response to Comment P-9-1.

Additionally, Section 4.13.3 of the Draft EIR states that a Health and Safety Plan, a standard regulatory requirement, is required for all workers on site. The Health and Safety Plan will be prepared in accordance with all federal, State, and local regulations for use during construction. Section 4.13.3 provides a detailed list of the applicable federal, State, and local regulations that will be included in the Health and Safety Plan.

**P-9-3**

This comment refers to Mitigation Measure 4.13.2. Section 4.13.2 of the Draft EIR is the Existing Environmental Setting.

Mitigation Measure 4.13.2, as well as Section 4.13.3, Regulatory Requirements, provides information regarding federal, State, and local regulations that require a Health and Safety Plan be prepared and followed during construction activities to ensure the safety of the workers on site.